

Wayne Earl Jenkins
#62928-037
Federal Correctional Institution
Post Office 6001
Ashland, Kentucky 41105

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Case No.: 17-CR-106

V.

WAYNE EARL JENKINS,

Pro Se Defendant.

DEFENDANT'S PRO SE AFFIDAVITS IN SUPPORT
OF COMPASSIONATE RELEASE MOTION,
SUPPLEMENTAL MOTION, AFFIDAVITS,
EXHIBITS, REPLY AND EXCEPTIONS AND
OR/OBJECTIONS

FILED
LOGGED
ENTERED
RECEIVED
MAR 02 REC'D
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

Being duly deposed, Defendant, Wayne Earl Jenkins, declares and states, these:

1. I am over the age of 18 years;
2. In and around September of 2019 Maryland State Commission on Restoring Trust In Policing and also Steptoe & Johnson LLP Independent Investigator invited myself to participate in their investigation(s) and commission(s) professional duties;
3. Attached is Exhibits "A", "B", & "C" Attorney: Senior Counsel Michael R. Bromwich with Steptoe & Johnson LLP: Letters relevant as to cooperation and assistance [Interview and Investigation]. See Exhibits "A", "B", & "C"!

Participation and Performance being assumed very relevant interviews in the interests of justice.

Whereas I, Wayne Earl Jenkins, declare and state under the pains and penalties of perjury all of the above

To be certain true and correct. Signed under the pains and penalties of perjury.

EXECUTED ON 24 DAY OF Feb, 2021.

Authorized by the Act of
July 7, 1995, as amended, to
administer oaths (18 U.S.C. § 4004).

The above appeared before me _____ SS

NAME/TITLE: A. Amos / Case Manager
DATE: 2/24/21

DEFENDANT'S PRO SE REPLY - 1

EXHIBIT

“A”

Michael R. Bromwich
202 429 8167
mbromwich@steptoe.com

Steptoe

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

January 14, 2021

Mr. Wayne Earl Jenkins
Register Number 062928-037
FCI Ashland
St. Route 716
Ashland, KY 41105

Dear Mr. Jenkins:

This is to follow-up on the earlier letters we sent to you on January 14 and July 28, 2020. As you know, those letters sought your cooperation in submitting to an interview in connection with our investigation of the GTTF corruption scandal.

I have just become aware that you responded to my July 28 letter the following day, July 29. Unfortunately, I was not provided your letter until last Thursday, January 14. I have not been to my office since March of last year, and mail delivery has been delayed or, in the case of your letter, not delivered at all. My apologies for the lengthy delay.

In addition to your long-delayed July 29 letter, we received on Friday a package from your sister, Robin McBride, that included the various materials relating to your motion for compassionate release. Thanks for providing them.

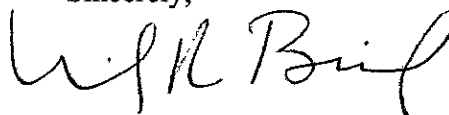
Even though our investigation is quite far along, we continue to be interested in speaking with you. My understanding is that it may be easier to arrange now that you are at FCI Ashland.

DEFENDANT'S PRO SE REPLY - 3

Letter to Mr. Wayne Earl Jenkins
January 19, 2021
Page 2 of 2

I am sending this letter through the Bureau of Prisons, whose personnel have been extremely cooperative in forwarding our previous letters to you. I am hopeful that they will help facilitate the interview we are seeking and that you appear willing to do.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael R. Bromwich". The signature is fluid and cursive, with the first name "Michael" and last name "Bromwich" clearly distinguishable.

Michael R. Bromwich

EXHIBIT

“B”

Michael R. Bromwich
202 429 8167
mbromwich@step toe.com

Step toe

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.step toe.com

July 28, 2020

Mr. Wayne Earl Jenkins
Register Number 62928-037
FCI EDGEFIELD
FEDERAL CORRECTIONAL INSTITUTION
P.O. BOX 725
EDGEFIELD, SC 29824

Dear Mr. Jenkins:

As you know, we wrote to you in January requesting an interview. We wanted to discuss the factors in your life and career that led you to engage in the conduct that led to your indictment, conviction and the sentence you are now serving. We also wanted to know how your career experiences in the Baltimore Police Department (BPD) and matters in your personal life (family issues, financial pressures, etc.) played a role in your engaging in that conduct, and whether you think things would have turned out differently if your training, your supervision, or other parts of your experience within BPD would have been different than they were. The goal is to understand, not to criticize or condemn.

We exchanged emails over the Bureau of Prisons email system, and I then, at your request, spoke and corresponded with Stephen Paige until sometime in mid-February. I am not interested in dealing with you through intermediaries who are not your attorney but only directly with you. Since I wrote to you, we have learned a number of things about you. We have reviewed the information you shared with the US Attorney's office and the FBI Task Force before they broke off discussions with you. We have learned many things about your background, including that you were the youngest of five children, and that you followed in your father's footsteps in joining and serving in the Marine Corps. We have learned that you were very involved with your children, including continuing involvement in their education; that you served as a football coach for children in your community; that you supported your widowed aunt and aging parents; and that you were consistently helpful and supportive of friends and neighbors. Obviously, none of this serves to explain your criminal conduct. Quite the contrary: it makes it harder to understand.

DEFENDANT'S PRO SE REPLY - 6

Mr. Wayne Earl Jenkins
Register Number 62928-037
July 28, 2020
Page 2

Steptoe

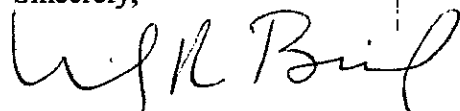
We have spoken to one of the defendants in this case and found our lengthy discussion with him (by video) to be extremely helpful in understanding the factors that led him to engage in the conduct that led to his conviction. As a result, when we tell his story in our report, it will be based in significant part on what he told us. We are making arrangements to speak with a second defendant, whose story we will also tell, at least in part from his point of view. We will also tell your story, whether or not you decide to speak with us – but if we are unable to speak directly with you, it will not include your voice and your perspective.

In all candor, we make this offer to you with some reluctance. After spending many hours with you, prosecutors with the US Attorney's office and members of the FBI Task Force found you to be deceitful, manipulative, and unreliable. Former officers in the GTTF under your supervision shared a similar view of you as deceitful and unreliable, which they testified about under oath at the trial of Daniel Hersl and Marcus Taylor.

We are only interested in speaking with you if you are committed to being fully truthful and candid. If not, we are both wasting our time. A candid account of why you did what you did would potentially be of great value to BPD recruits and young officers. If they could hear from you about the choices you made and why you made them, it might well help them to avoid the pressures and turn away from the temptations that you faced. It would be a way for you to give back.

We look forward to hearing from you.

Sincerely,



Michael R. Bromwich

cc: Honorable Catherine C. Blake
United States District Judge

Honorable James K. Bredar
United States District Judge

DEFENDANT'S PROSE REPLY - 7

EXHIBIT

“C”

Michael R. Bromwich
202 429 8167
mbromwich@steptoe.com

Steptoe
STEPTOE & JOHNSON LLP

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

January 14, 2020

Mr. Wayne Earl Jenkins
Register Number 62928-037
FCI Edgefield
501 Gary Hill Road
Edgefield, SC 29824

Dear Mr. Jenkins:

As you may have learned from media reports, my law firm — Steptoe & Johnson — and I have been hired to conduct an independent investigation of the Gun Trace Task Force. Our independent investigation has been specifically approved in a court order issued by Judge James K. Bredar of the United States District Court for the District of Maryland on October 29, 2019.

Our assignment has a different focus from the criminal investigation conducted by the FBI Task Force and your subsequent prosecution by the U.S. Attorney's Office. We have been asked to conduct an investigation that focuses on trying to explain the conduct that led to the indictment and conviction of you and other GTTF personnel. The factors that help explain the conduct may be unique to you and your individual circumstances, but they may also be explained in part by organizational and cultural factors in the Baltimore Police Department. We are interested in meeting with you to ask you questions, and we are hoping to get candid and thoughtful responses. We are less interested in what you did, which is already a matter of public record, and more interested in *why* you did what you did, and what weaknesses within BPD — in training, mentoring, supervision, accountability, etc. — allowed you to engage in the conduct for which you were prosecuted.

We will ask you some tough questions but we will treat you with dignity and respect. We are genuinely interested in your view as to the factors that contributed to your willingness to engage in conduct that was at odds with your responsibilities as a police officer. Discussions with you and the other members of the GTTF with whom you worked are a very important part of what we have been asked to investigate.

We look forward to communicating with you and meeting with you in the near future.

Sincerely,



Michael R. Bromwich



Stephen Page <stephenmpage2020@gmail.com>

Letters

2 messages

Bromwich, Michael <mbromwich@steptoe.com>
To: Stephen Page <stephenmpage2020@gmail.com>

Wed, Feb 17, 2021 at 5:29 PM

Dear Stephen,

It was very good speaking with you a few minutes ago.

Attached are the three letters I have sent to Wayne Jenkins since January 2020.

1. Letter+to+Mr.+Wayne+Jenkins-c2-c2.PDF (squarespace.com)
2. Letter+to+Wayne+Jenkins+7.28.20-c2-c2.pdf (squarespace.com)
3. See attachment.

At your request, this is to confirm that we want to interview Mr. Jenkins as part of our investigation into the Gun Trace Task Force corruption scandal. We spoke with Mr. Jenkins on January 20 and are interested in scheduling an interview with him in the near future. We think Mr. Jenkins's assistance could potentially be quite useful to us.

Thanks very much for your assistance.

MRB

Michael R Bromwich

Senior Counsel

mbromwich@Steptoe.com

+1 202 429 8167 direct | +1 202 429 3902 fax

Steptoe

Steptoe & Johnson LLP

1330 Connecticut Avenue, NW | Washington, DC 20036

DEFENDANT'S PRO SE REPLY TO

 **BPD -- Letter to Wayne Jenkins-c2.pdf**
128K

SPECIAL MAIL

ROSE'S LEGAL PROJECT

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WAYNE EARL JENKINS

Criminal Case No. 17 CR 106

Petitioner/Defendant

PRO SE

V.

CERTIFICATE OF SERVICE

UNITED STATES OF AMERICA,

Respondent/Plaintiff

I, Wayne Earl Jenkins, declare and state, pursuant to Title 28 U.S.C. Section 1746 the following to be accurate, certain, understood as fact, and truthfully correct to the best of my knowledge:

Being of sound mind, I have sent by U.S. Postal Mail Service by virtue of First Class Postages prepaid and properly affixed and addressed to these below with set amounts of Original and 3 True and Correct Copies of:

DDEFENDANT'S PRO SE AFFIDAVIT IN SUPPORT OF COMPASSIONATE RELEASE MOTION, SUPPLEMENTAL MOTION, AFFIDAVITS, EXHIBITS, REPLY, AND EXCEPTIONS AND OR OBJECTIONS with this Certificate of Service

Properly sealed in U.S. Postal envelopes and accurately labeled for the following:

[Original & 2 True & Correct Copies];

[1 True & Correct Copy]

Office of the Clerk USDC D MD Baltimore Division
101 West Lombard Street
Baltimore, Maryland
21210

Office of the U.S. Attorney's MD
District of Maryland Baltimore
36 South Charles Street, Fourth Floor
Baltimore, Maryland 21201

EXECUTED ON 24 Day of Feb, 2021.

MR. WAYNE EARL JENKINS

DEFENDANT'S PRO SE REPLY - 11.

Wayne Jenki

#67127-037

Federal Correctional Institute

P.O. Box 6001

Ashland, Kentucky 4110

Court

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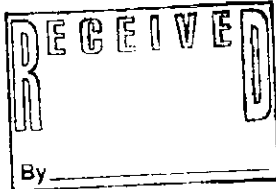
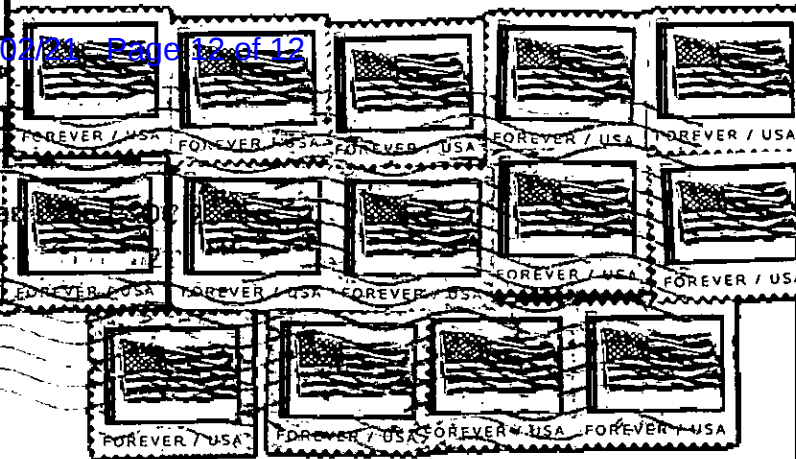
CERTIFIED MAIL



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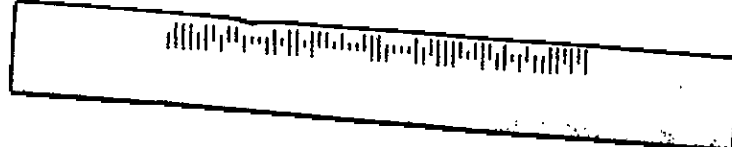
USDC of Maryland
Baltimore Division

Office of the Clerk

101 west Lombard Street

Baltimore, Maryland 21210

LEGIT
MAIL



CRG